

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CASE NO 18-04639 MCF

WANDA IVELISSE HERNANDEZ DE LA ROSA

CHAPTER 13

DEBTOR

**DEBTOR'S REPLY TO TRUSTEE'S REPORT ON CONFIRMATION
DOCKET NO. 13**

TO THE HONORABLE COURT:

COMES NOW, WANDA IVELISSE HERNANDEZ DE LA ROSA, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Report on Confirmation*, Docket No. 13, objecting the confirmation of Debtor's proposed *Amended Chapter 13 Plan* (Docket No. 03) basically stating the following:

---the Debtor to review and provide evidence of medical expenses;
---that the Debtor should include a credit on the Debtor's residential real property in Schedule A/B; and
---that BPPR claims that its POC #2 be paid in full through the Plan and that the Debtor to inform course of action concerning BPPR's treatment under the Plan.

2. The Debtor respectfully replies to the Trustee's report as follows

---that on March 05, 2019, the Debtor filed *Amended Schedule "J"*, Docket No. 19, to review and amend the "medical expenses" item previously reported

Page -2-
Reply to Trustee's Unfavorable Report
Case no. 18-04639 MCF13

---that the Debtor also submitted to the Chapter 13 Trustee (uploaded to the Trustee's system) a copy of the Debtor's medical expenses summary for the period of time from January/2018 through October/2018;

---that the Debtor also filed *Amended Schedule A/B*, Docket No. 18, to inform the aforestated credit on the Debtor's residential real property;

---that the Debtor filed an *Amended Chapter 13 Plan*, Docket No. 17, whereby BPPR's direct post-petition payments made by the Debtor are specifically provided for; and

--- that the Debtor is attaching to the present Reply copy of the Debtor's direct post-petition mortgage loan payments made to BPPR for the months of December/2018, January/2019 and February/2019. The Debtor is current in the direct post-petition payments to secured creditor BPPR.

3. The Debtor hereby respectfully responds to the Trustee's unfavorable report on Plan confirmation, Docket No. 13, in the above captioned case.

WHEREFORE, the Debtor respectfully prays that Trustee's unfavorable recommendation, Docket No. 13, be denied and the Debtor's proposed *Amended Plan*, Docket No. 17, be confirmed.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following CM/ECF non-participant: Debtor, Wanda Ivelisse Hernandez de La Rosa, RR 4 Box 2888 Bayamon PR 00956, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 5th day of March, 2019.

/s/**Roberto Figueroa Carrasquillo**
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
ATTORNEY FOR the DEBTOR
PO BOX 186 CAGUAS PR 00726-0816
TEL 787-744-7699 FAX 787-746-5294
EMAIL: rfigueroa@rfclawpr.com